

## Comment from Electric Drive Transportation Association (EDTA)

The Electric Drive Transportation Association (EDTA), the cross-industry trade association promoting the advancement of electric drive technology and electrified transportation, believes that achieving net-zero emissions transportation for all Americans is a critically important goal. EDTA's members represent the entire value chain of electric drive, including vehicle manufacturers, battery and component manufacturers, utilities and energy companies, smart grid and charging infrastructure developers and operators. Collectively, we are committed to realizing the economic, national security and environmental benefits of displacing oil with electricity in hybrid, plug-in hybrid, battery, and fuel cell electric vehicles. We appreciate Treasury's request for comments on the prevailing wage and apprenticeship requirements of the Inflation Reduction Act (IRA) as they apply to Sec. 30C and look forward to working with the Department to ensure that these provisions of the IRA are as effective as possible in supporting U.S. leadership in transportation electrification.

November 4, 2022

Submitted electronically via [www.regulation.gov](http://www.regulation.gov) (IRS-2022-0051)

U.S. Department of the Treasury  
Washington, D.C.

**Re:** Submission of comments in response to IRS Notice 2022-51, Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy Communities Requirements Under the Act Commonly Known as the Inflation Reduction Act of 2022

**Docket:** <https://www.regulations.gov/document/IRS-2022-0025-0001>

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The prevailing wage and apprenticeship requirements that must be met to qualify for the bonus value of the Sec. 30C credit represent significant and novel compliance challenges for the emerging electric vehicle infrastructure industry, as well as for the diverse consumers acquiring EV infrastructure.

The electric vehicle infrastructure industry will need detailed guidance on how to comply and how to verify compliance. The companies and their contractors need to be able to build systems to hire appropriately and to track compliance. The complexity of the endeavor is compounded by the short time frame in which to accomplish it.

We would also ask that guidance recognizes the diversity of consumers, e.g., residential, commercial, municipal and fleet, and the material differences in the size and labor associated with their infrastructure projects.

Again, we appreciate the opportunity to comment and work with you to ensure the efficient and effective implementation of the incentive for electric transportation infrastructure.

Sincerely,  
Genevieve Cullen  
President

